

COPY

STEVEN S. ALM
 United States Attorney
 District of Hawaii

FILED IN THE
 UNITED STATES DISTRICT COURT
 DISTRICT OF HAWAII

ELLIOT ENOKI
 First Assistant U.S. Attorney

AUG 16 2000
 at 1 o'clock and 12 min P.M.
 WALTER A. Y. H. GHINN, CLERK

RONALD G. JOHNSON
 Assistant U.S. Attorney
 PJKK Federal Bldg.
 300 Ala Moana Blvd., Rm 6-100
 P.O. Box 50183
 Honolulu, Hawaii 96850
 Telephone: (808) 541-2850

Attorneys for Plaintiff,
 UNITED STATES OF AMERICA

IN THE UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF HAWAII

CR. NO. CR 00-00328 HG

| | | |
|---------------------------|--------|--------------------|
| UNITED STATES OF AMERICA, |) | CR. NO. |
| |) | |
| Plaintiff, |) | INDICTMENT |
| |) | [18 U.S.C. § 371] |
| v. |) | [18 U.S.C. § 1028] |
| CHRISTOPHER ROTH, | (01)) | |
| LEON PANG, | (02)) | |
| BON EUNG KOO, | (03)) | |
| DAVID THOMPSON, | (04)) | |
| JAMES THOMPSON, | (05)) | |
| MARIA TERESA TIJERINA, | (06)) | |
| |) | |
| Defendants. |) | |
| |) | |

INDICTMENT

THE CONSPIRACY AND ITS OBJECTS

The Grand Jury charges:

1. From a time unknown to the Grand Jury and continuing to on or about July 31, 2000, in the District of Hawaii, CHRISTOPHER

ROTH, LEON PANG, BON EUNG KOO, DAVID THOMPSON, JAMES THOMPSON, MARIA TERESA TIJERINA, defendants herein, did willfully and knowingly combine, conspire, confederate, and agree together and with each other, and with persons both known and unknown to the Grand Jury, to commit offenses against the United States, to wit:

(a) to knowingly and without lawful authority, produce in and affecting interstate commerce, five or more false identification documents, to wit: state identification cards, in violation of Title 18 United States Code, Section 1028(a)(1).

(b) to knowingly transfer in and affecting interstate commerce false personal identification cards, to wit: false state identification cards, knowing that such personal identification cards were produced without lawful authority, in violation of Title 18 United States Code, Section 1028(a)(2).

MANNER AND MEANS OF THE CONSPIRACY

2. It was part of the conspiracy that the defendants would solicit individuals, primarily underage male and female tourists, and for a fee provide them with false state identification cards that would allow them to enter clubs and other establishments that sell alcoholic beverages. The business was conducted under the names "Island Identification, Novelty i.d.'s," "Holograms Hawaii," and "Alpha Digital." The false state identification cards would contain the photo of the underage individual with information that would establish their age as 21 or greater.

False state identification cards would also be produced for persons over the age of 21. These false state identification cards were produced in Hawaii without the lawful authorization of the state named on the card.

3. It was further part of the conspiracy that the defendants would take a digital photograph of the purchaser and enter it into a computer. They would receive the information to be contained on the false state identification from the purchaser. They would then pull up a computer stored template of the state identification selected by the purchaser and place within it the information provided. The photograph of the purchaser was then added to the template and it was printed. The template would be signed by the purchaser and it would be trimmed and then laminated.

OVERT ACTS

4. In furtherance of the conspiracy and to effect the objects of the conspiracy, defendants, CHRISTOPHER ROTH, LEON PANG, BON EUNG KOO, DAVID THOMPSON, ^{JAMES Thompson} ~~and~~ ^{and} MARIA TERESA TIJERINA, and their co-conspirators, committed diverse overt acts, in the district of Hawaii, among which were the following:

a. On or about June 23, 1999, LEON PANG arranged for the sale of false identifications to an under cover police officer and met the officer at the Waikiki Marine Surf Hotel.

b. On or about June 23, 1999, CHRISTOPHER ROTH took a digital photo and obtained information from an under cover officer which he entered into a computer and used to produce a false Oregon state identification card in the name of Andrew Bonilla and a false Arizona state identification card in the name of Andrew Bonilla.

c. CHRISTOPHER ROTH provided the under cover officer with the two false identification cards and collected \$40.00 from the officer as payment.

d. On or about July 2, 1999, CHRISTOPHER ROTH took a digital photo and obtained information from two under cover police officers, which he entered into a computer and used to produce two false Oregon state identification cards in the name of Beth Daniels and two false Colorado state identification cards in the name of Lee.

e. CHRISTOPHER ROTH collected \$40.00 from one officer as payment for two identification cards and gave \$10.00 change.

f. BON EUNG KOO collected \$40.00 from the second officer and provided \$10.00 change.

g. On or about July 2, 1999, DAVID THOMPSON operated the computer during the production of identification cards for other customers.

h. On or about July 2, 1999, BON EUNG KOO operated the computer during the production of identification cards for other customers.

i. On July 8, 1999, MARIA TERESA TIJERINA asked an under cover police officer to select a state of origin for a false identification card.

j. DAVID THOMPSON provided the under cover officer with a book of identifications to choose from.

k. MARIA TERESA TIJERINA wrote out the information that was to appear on the false identification.

l. DAVID THOMPSON took a digital photo and obtained information from an under cover police officer, which he entered into a computer and used to produce two false Michigan state identification cards in the name of Augustin.

m. DAVID THOMPSON collected \$40.00 from the under cover officer as payment for the two false identifications.

n. On or about January 27, 2000, MARIA TERESA TIJERINA, produced a Canadian National Defense Military identification card in the name of Shellie C. Andersen.

o. On or about April 28, 2000, CHRISTOPHER ROTH arranged for the production of six identification cards to be made for an under cover police officer by JAMES THOMPSON.

p. On or about April 28, 2000, JAMES THOMPSON took a picture of and obtained information from an under cover police

officer, which he entered into a computer and used to produce two false Arizona state identification cards in the name of Vasquez, two false Connecticut state identification cards in the name of Vasquez, and two false Wyoming state identification cards in the name of Vasquez.

q. MARIA TERESA TIJERINA collected \$150.00 from the under cover police officer as payment for the two Arizona, two Connecticut, and two Wyoming false identification cards produced by JAMES THOMPSON.

All in violation of Title 18 United States Code, Section 371.

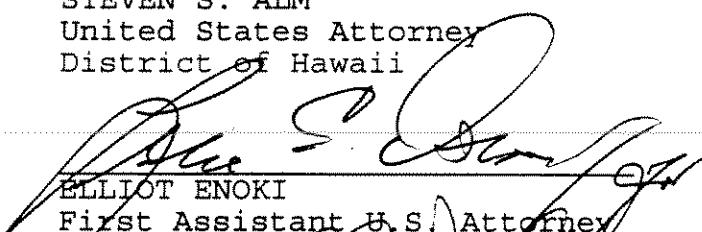
DATED: AUG 16 2000, 2000, Honolulu, Hawaii.

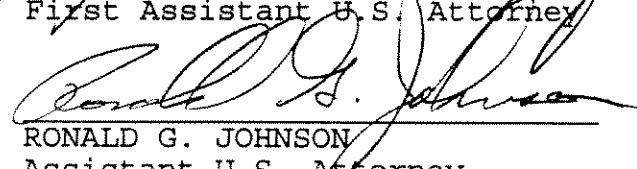
A TRUE BILL

151

FOREPERSON, GRAND JURY


STEVEN S. ALM
United States Attorney
District of Hawaii


ELLIOT ENOKI
First Assistant U.S. Attorney


RONALD G. JOHNSON
Assistant U.S. Attorney

United States v. Christopher Roth et.al.
Cr. No.
"Indictment"